

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

THE STANLEY M. HERZOG
FOUNDATION,

Plaintiff,

v.

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION;
CHARLOTTE BURROWS, Chair of the
Equal Employment Opportunity
Commission, in her official capacity,

Defendants.

No. 4:24-cv-00651

**PLAINTIFF STANLEY M. HERZOG FOUNDATION'S MOTION FOR PRELIMINARY
INJUNCTION**

COMES NOW Plaintiff Stanley M. Herzog Foundation (“Plaintiff” or “the Foundation”), by and through its undersigned counsel for its Motion for Preliminary Injunction against Defendants Equal Employment Opportunity Commission and Charlotte Burrows (collectively “Defendants”). Pursuant to Fed. R. Civ. P. 65(a), Plaintiff moves for a preliminary injunction prohibiting enforcement of 29 C.F.R. § 1636.1 *et seq.* (“the Final Rule”), with respect to its mandate that Plaintiff and other similarly situated employers provide accommodations for abortion under the Pregnant Workers Fairness Act.

For the reasons stated more fully in Plaintiff’s Suggestions in Support, Plaintiff asks this court to enjoin Defendants from enforcing the Final Rule, the Pregnant Workers Fairness Act (42 U.S.C. § 2000gg *et seq.*), and Title VII of the Civil Rights Act (42 U.S.C. § 2000e, *et seq.*) to the extent they compel Plaintiff to accommodate abortion under the Final Rule and change its employment practices embodying its sincere religious belief against abortion.

Dated: January 7, 2024

Respectfully submitted,

GRAVES GARRETT GREIM LLC

/s/ Edward D. Greim
Edward D. Greim (MO 54034)
Katherine E. Graves (MO 74671)
Michael Scott (MO 74361)
1100 Main Street, Suite 2700
Kansas City, Missouri 64105
Tel.: (816) 256-3181
Fax: (816) 222-0534
edgreim@gravesgarrett.com
kgraves@gravesgarrett.com
mscott@gravesgarrett.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Edward D. Greim, hereby certify that on January 7, 2025, I electronically filed the foregoing Complaint with the Clerk of the Court using the Court's CM/ECF system, which sent notice to all counsel of record.

/s/ Edward D. Greim

Edward D. Greim

Attorney for Plaintiff